

# **Exhibit B**

# Holland & Knight

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April 25, 2024

*Via Email*

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Re: *Ballard et al v. Navient / Case No. 3:18-CV-121 – Plaintiff Deposition Requests*

Counsel:

As we discussed last week, Navient would like to take depositions of each Plaintiff (each not to exceed 90 minutes) at which time we intend to examine Plaintiffs on issues related to the proposed new class definitions, which are fundamentally different than the definitions in place when each Plaintiff was deposed in 2022. Our request is consistent with the Court's prior rulings that issues related to class certification (*e.g.*, adequacy, typicality, predominance, the extent to which the proposed definitions are fail-safe definitions), and case-dispositive arguments be decided based on a “full record”. To the extent that any Plaintiff’s loan status has changed in the past two years, we reserve the right to ask questions about those issues as well.

During our April 19 meet-and-confer, we also asked that you consider what discovery remains to be done other than completion of the four searches previously discussed.

Please let us know your position on both issues on or before April 30th.

Anthony Fiorentino  
Daniel A. Edelman  
Carlo Sabatini  
April 25, 2024  
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Sincerely,

/s Andrew Soven

Andrew J. Soven

AJS